

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

David Oppenheimer and
Performance Impressions, LLC,

Plaintiffs,

vs.

Elizabeth Shirley and
Liz Shirley Real Estate,
Defendants.

Case No. 2:17-cv-863-RMG

(JURY TRIAL DEMANDED)

**PLAINTIFFS' ANSWERS TO
LOCAL RULE INTERROGATORIES**

COME NOW Plaintiffs in the above captioned action, and, answering the Local Rule Interrogatories, show this Honorable Court as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

None.

(B) As to each claim, state whether it should be tried jury or nonjury why.

Plaintiffs have demanded trial by jury on all claims.

(C) State whether the party submitting these responses is a publicly owned company and separately identify. (1) each publicly owned company which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

No.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

The Defendant is located in the Charleston Division and the acts giving rise to this action took place in the Charleston Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide. (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

No.

Respectfully Submitted,

WYCHE, P.A.

s/ Christopher B. Schoen

Meliah Bowers Jefferson (D.S.C. Id. No. 10018)

Christopher B. Schoen (D.S.C. Id. No. 11421)

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March 31, 2017